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ELECTRONIC FILING

Marlene H. Dortch, Esq.
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: ***Ex Parte Notice***
WT Docket No. 01-309
Hearing Aid Compatibility – Digital Wireless Handsets

Dear Ms. Dortch:

On behalf of Motorola, Inc. and in accordance with Section 1.1206 of the Commission's Rules, 47 C.F.R. § 1.1206 (2003), this is to note that Mary Brooner and Scott Kelley of Motorola met with Michael Wilhelm, Nicole McGinnis, Greg Gice, and Andrea Cunningham of the Wireless Telecommunications Bureau on November 19, 2004, to discuss issues in WT Docket 01-309 pertaining to hearing aid compatibility for digital wireless handsets. A copy of the slides from the presentation is attached.

Respectfully,

/s/ David E. Hilliard

David E. Hilliard
Counsel for Motorola, Inc.

Attachment
cc (via email): Michael Wilhelm
Greg Guice
Nikki McGinnis
Andrea Cunningham

Hearing Aid Compatibility with Digital Wireless Handsets Docket 01-309

Mary Brooner, Scott Kelley
Motorola
November 19, 2004

The Test Standard Going Forward

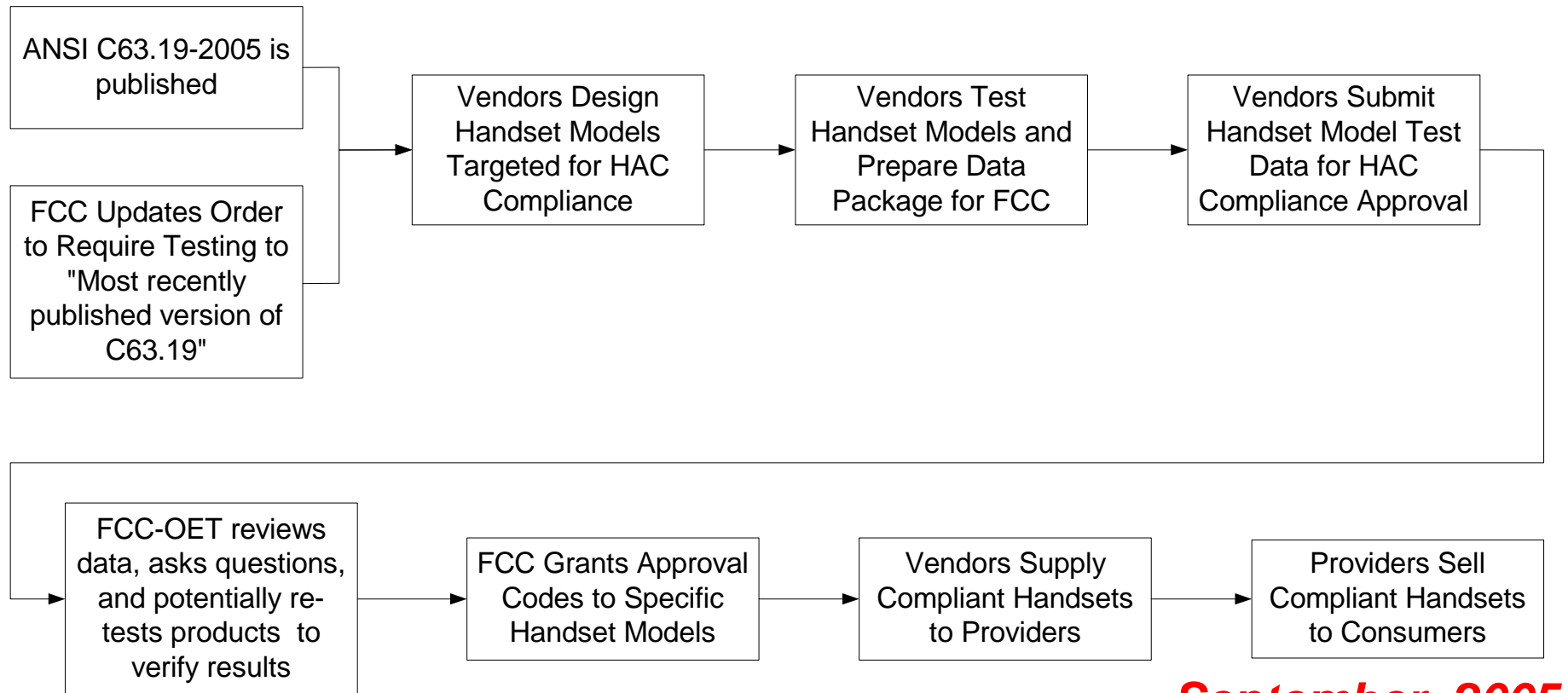
- Wireless Industry through the ATIS Incubator substantially engaged now for 18 months in testing and reviewing the ANSI C63.19 standard to have the best possible standard by 3Q05.
- Improvements to the standard in several ANSI ballotings are substantial and it is critical that these improvements be reflected in the FCC's rules.
- ***Recommendation 1:*** Amend Rule 20.19(b)(1),(2) such that vendors are required to test to the “most recently published version of ANSI C63.19” and provide delegated authority to OET to approve interim changes to the most recently published standard by Public Notice.

Vendors Need Certainty to Test to Specified Standard

- Vendors need certainty of FCC decision to know what standard will be used for testing, vendors will begin to seek FCC grant authorization for HAC Compatible handsets, e.g. handsets that measure an M3 or M4.
 - Vendors have a concern about approval cycle time with FCC because these handsets will not be also approved by TCBs.
 - There will be a bubble; shorter the time between FCC decision and effective date, bigger the bubble.
- ***Recommendation 2:*** Publish soon the FCC decision concerning the standard that vendors may use for testing.

HAC Compliance Deadline

TODAY



September, 2005

Publication of Test Information

- OET processes will drive what information is published by vendors.
 - For product performance rating, there is no clarity yet for whether vendor publishes own results or awaits FCC tested results.
 - Does OET intend to test each model before grant of Authorization Code?
 - Timing extremely important for ship authorization to carriers.
 - Options for Product labeling exist:
 - FCC Approved
 - FCC Compliant
 - Compliant with C63.19, M3

Devices not covered by ANSI C63.19

- Standard currently does not cover UMTS handsets.
- Industry should eventually extend C63.19 to these devices.
- It will take some time to appropriately modify provision in the current standard to address this technology.
- ***Recommendation 3:*** *FCC should extend a de minimis exception for a period of time to UMTS and other applicable technologies not included in C63.19 until they can be incorporated into the standard.*